

UNITED STATES DEPARTMENT OF EDUCATION OFFICE OF POSTSECONDARY EDUCATION

May 11, 2016

GEN 16-10

Subject: Receiving Title IV Aid for Teacher Certification Programs

Summary: This letter clarifies the program and student eligibility requirements for students

to receive Title IV aid for enrollment in teacher certification programs.

Dear Colleague:

This letter responds to requests we have received to clarify the eligibility requirements for a student to receive Title IV Federal student aid for coursework necessary to obtain a professional credential or certificate from a State that is required for employment as a teacher in that State.

Overview

Under section 484(a)(1) of the Higher Education Act of 1965, as amended (HEA), one of the eligibility requirements for a student to receive assistance from programs authorized under Title IV of the HEA is that the student must be enrolled at an eligible institution in an educational program that leads to a degree, certificate, or other credential awarded by the institution. However, under section 484(b)(4) of the HEA, otherwise eligible students may receive aid from the Direct Loan, Perkins Loan, and Federal Work Study programs if they are enrolled at an eligible institution on at least a half-time basis in a program necessary to receive a professional credential or certificate from a State that is required for employment as an elementary or secondary school teacher in that State, even though the institution where the students take the coursework does not award a degree or other educational credential upon the completion of that coursework.

Additionally, under section 401(c)(4)(B) of the HEA, under certain conditions, students may receive Pell Grant funding for enrollment on at least a half-time basis in a "postbaccalaureate program that does not lead to a graduate degree, and in courses required by a State in order for the student to receive a professional certification or licensing credential that is required for employment as a teacher in an elementary school or secondary school in that State"

Finally, under section 420M(d)(1) of the HEA, students may receive funds under the TEACH Grant Program "for the completion of the first baccalaureate or post-baccalaureate course of study. . . ." HEA section 420L(2) defines "post-baccalaureate," in part, as "a program of instruction for individuals who have completed a baccalaureate degree . . . that consists of courses required by a State in order for a teacher candidate to receive a professional certification

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or licensing credential that is required for employment as a teacher in an elementary or secondary school in that State "

Terminology

Throughout this letter, the term "teacher certification program" means a program that consists of courses a student must complete as a condition for receiving a State-issued professional certification or credential that is required for employment as an elementary or secondary school teacher in that State, and that does not lead to a degree, certificate, or other credential awarded by the institution.

In this letter, we will refer to the document issued by a State that provides the legal authorization for an individual to teach in that State as a "credential or certificate." However, some States may use other terms to refer to this document, such as a license, an endorsement, or an authorization.

Applicability of Guidance in This Letter

We emphasize that the guidance in this letter applies only to students enrolled in teacher certification programs that do *not* lead to a degree, certificate, or other credential awarded by the institution. A student who is enrolled in an educational program that leads to a degree or other credential awarded by the institution (even if the program also satisfies the requirements for a student to receive a teaching certificate or other teaching credential from a State) is eligible to be considered for aid under any of the Title IV Federal student assistance programs in accordance with all of the regular student and program eligibility requirements applicable to that program.

We also emphasize that, for all institutions, a teacher certification program that does not lead to a degree, certificate, or other credential awarded by the institution is not a gainful employment (GE) program under 34 CFR Part 668, Subpart Q. However, if a for-profit institution offers a program that leads to a degree or other credential awarded by the institution, or if a public or not-for-profit institution offers a program that leads to a certificate or other nondegree credential awarded by the institution, that program is a GE program. For additional guidance on what is considered a GE program, see GE Electronic Announcement #53.

General Guidance

Except as noted below under "Program-Specific Provisions," an otherwise eligible student may receive aid under the Title IV Federal student financial assistance programs for a teacher certification program, as defined earlier in this letter, that must be completed:

- For a student to receive an initial teaching credential or certificate;
- For periodic renewal of a teaching credential or certificate that is required by the State where the student currently has a credential or certificate;

- For a student who has a teaching credential or certificate in one State to receive a credential or certificate in another State; or
- For a student to receive an additional teaching certificate or credential that is *required* by a State for the student to teach in a different subject area. For example, a student who is currently certified to teach grades 1 through 5 may receive aid for a teacher certification program that includes courses needed to receive a certification that is required to teach special education. Similarly, a student who is currently certified to teach math may receive aid for a teacher certification program leading to a separate State certification that is required to teach science.

A student may not receive aid under the Title IV Federal student assistance programs for coursework that the student chooses to complete for professional advancement or recognition in the teaching field, but that is not *required* by the State to receive or maintain a teaching credential or certificate. In addition, when determining the cost of attendance and enrollment status for a student who is enrolled in a teacher certification program, schools may not include any coursework other than the coursework that is required by the State for the relevant teaching credential or certificate. Courses not required by the State may not be included, even if they are in related subject areas.

Teacher certification programs are, for all Title IV purposes, considered to be undergraduate programs because they do not lead to a graduate-level degree, certificate or other credential awarded by the institution. Therefore, students enrolled in such programs are considered to be undergraduate students for purposes of dependency determinations and loan limits.

Program-Specific Provisions

Direct Loan Program

Under the Direct Loan Program regulations at 34 CFR 685.203(a)(7) and (c)(2)(vii), a student may receive Direct Subsidized Loans and/or Direct Unsubsidized Loans for an eligible teacher certification program up to the following annual loan limits:

- \$5,500 per academic year for a dependent student. This is a combined annual loan limit for Direct Subsidized Loans and/or Direct Unsubsidized Loans. A *dependent* student enrolled in a teacher certification program is *not* eligible to receive the additional \$2,000 in Direct Unsubsidized Loans that is available to a dependent student enrolled in a program leading to a degree or certificate awarded by the institution.
- \$12,500 per academic year (not more than \$5,500 of this amount may be in Direct Subsidized Loans) for an independent student (or a dependent student whose parent is unable to obtain a Direct PLUS Loan). This is the same annual loan limit that applies to a third year or beyond independent undergraduate student (or a dependent undergraduate

student whose parent is unable to obtain a Direct PLUS Loan) who is enrolled in a program leading to a degree or certificate awarded by the institution.

An otherwise eligible parent borrower may receive a Direct PLUS Loan to help pay for the cost of a dependent student's attendance in an eligible teacher certification program. However, because Direct PLUS Loans are available only to graduate or professional degree students and parents of dependent undergraduate students, a student borrower may not receive a Direct PLUS Loan for enrollment in a teacher certification program. Students enrolled in teacher certification programs are not considered to be graduate or professional students.

If a student receives Direct Loan funds for a degree or certificate program and for a teacher certification program for the same academic year, the annual loan limit is a combined limit that covers both the degree or certificate program and the teacher certification program. For example, if a 4th-year independent undergraduate who is completing the final term of a bachelor's degree program in the fall semester of a fall-spring academic year receives \$2,750 in a Direct Subsidized Loan and \$3,500 in a Direct Unsubsidized Loan, and then enrolls in a teacher certification program in the spring semester, the student would have \$6,250 in remaining Direct Loan eligibility (not to exceed \$2,750 in Direct Subsidized Loans) for the teacher certification program during that same academic year.

Subject to remaining eligibility under the undergraduate aggregate loan limits, a student may receive Direct Loan funds for more than one eligible teacher certification program, as described above.

TEACH Grant and Pell Grant Programs

Under the TEACH Grant program regulations at 34 CFR 686.3(a), an undergraduate student may receive a TEACH Grant only for a *first* baccalaureate program and/or a *first* post-baccalaureate (i.e., teacher certification) program. Therefore, a student who previously completed a teacher certification program may not, for example, receive TEACH Grant funds for completion of a subsequent teacher certification program that is required for periodic recertification or for certification to teach in a different subject area.

Under the Pell Grant regulations at 34 CFR 690.6(c)(5) a student may receive Pell Grant funds for a post-baccalaureate (i.e., teacher certification) program only if the student is pursuing an *initial* teacher certification or licensing credential within a State. A student who is already certified to teach in a State may not receive Pell Grant funds for a teacher certification program that is required for recertification in that State, or to receive a credential from that State that is required to teach in a different subject area.

In accordance with paragraph (2) of the definition of "post-baccalaureate program" in the TEACH Grant Program regulations at 34 CFR 686.2(d) and with the Pell Grant regulations at 34 CFR 690.6(c)(3), a student may receive TEACH Grant or Pell Grant funds for an otherwise

eligible teacher certification program only if the institution that offers the program does not also offer a baccalaureate degree in education.

Federal Supplemental Educational Opportunity Grant (FSEOG) Program

The FSEOG program does not provide grants for enrollment in teacher certification programs.

Ineligibility of Coursework for Nonteaching Educational Credentials

The statutory provisions cited above allow certain students who are not enrolled in a program that leads to a degree, certificate, or other credential awarded by the institution to receive Title IV aid only for coursework that must be completed to receive a credential or certificate from a State that is required for employment as a *teacher* in an elementary or secondary school. Some institutions may offer programs that do not lead to a degree or certificate awarded by the institution, and that prepare a student to receive a State certificate or credential for an education-related occupation other than a teacher. Such programs include, but are not limited to, programs that prepare students to receive a credential or certificate from a State to become school principals, superintendents or other administrators, counselors, librarians, nurses or other health professionals, or other types of nonteaching professionals in an elementary or secondary school classroom. Such programs are not considered to be teacher certification programs under the HEA, even if completion of the program leads to a State-issued credential or certification that is a requirement for employment in the non-teaching position. Thus, students may not receive Title IV aid for enrollment in such programs.

Contact Information

If you have questions about the guidance provided in this letter, please contact Federal Student Aid's Research and Customer Care Center Staff. Staff is available Monday through Friday between the hours of 9:00 a.m. and 5:00 p.m. (Eastern Time) at 1-800-433-7327. After-hours calls will be accepted by an automated voice response system. Callers leaving their names and phone numbers will receive a return call the next business day. Alternatively, you may e-mail the Care Center at fsa.customer.support@ed.gov.

Sincerely,

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Deputy Assistant Secretary

for Policy, Planning, and Innovation

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